



Grace E. Koh  
Policy Counsel  
Public Policy Office

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March 16, 2011

**VIA ECFS**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Consumer Information and Disclosure Truth-in-Billing Format IP-Enabled Services, CG Docket No. 09-158**

Dear Ms. Dortch:

Yesterday, Robin Dunson from Cox Communications, Inc. ("Cox") and Barry Ohlson and the undersigned from Cox Enterprises, Inc. met with Arthur Scrutchins, John B. Adams, Lynn Ratnavale, Bill Freedman, Kurt Schroeder, and Rebecca Hirselj (who participated by phone) of the Consumer and Governmental Affairs Bureau; Katie Costello (who also participated by phone) of the Media Bureau; and Matt Warner of the Wireline Competition Bureau to discuss consumer information and disclosure requirements. In particular, we focused on Cox's point of sale disclosures and billing practices.

We noted that the wireless and wireline markets for voice, video, and data services are competitive, and providers such as Cox have every incentive to provide consumers with accurate information in its marketing, during the sales process, and after a customer signs up for service. The cost of acquiring a customer is steep, and customers are willing to switch providers if they are dissatisfied. Cox seeks to differentiate itself competitively by its customer service. In this regard, our brands and taglines have focused on our customer service, e.g., "Unbelievably Fair;" "Your Friend in the Digital Age;" and "Trusted Provider."

We discussed our point-of-sale disclosures and the important role of our customer service representatives ("CSR") during that process. For example, prior to ending a sale with new orders, the CSR provides a number of disclosures including: the first (next) bill's total charges, the bill cycle, and the due date. If the customer is on a promotional campaign, the CSR explains the promotional rate, the end date of the campaign, and the after-promotion rate. Cox also sends an email recapping the same information to the new customer, if an email address is provided.

We also explained that any early termination fees are disclosed for Cox's Price Lock Guarantee contracts and for any wireless contract that includes a discounted handset or device. Early termination fees for both types of contracts are prorated on a straight line. We explained that customers are able to cancel any of our services within 30 days without any penalty, whether the customer has subscribed to a month-to-month or a contract-bound service. The first bill typically arrives within two weeks of subscription.

March 16, 2011

Our mobile services are branded with the tagline “Unbelievably Fair” and designed with an eye toward differentiating Cox services with features such as MoneyBack Minutes, a service that allows customers to receive money for unused minutes. We also discussed our usage alerts for voice and text services. Customers also are able to monitor voice and data usage online.

We also discussed Cox’s recent redesign of both its website and its bill, and its extensive customer outreach during that process. The goal of the redesign was to ensure that the website would serve as a consumer-friendly channel for interactions between Cox and its subscribers. We distributed the attached flyer, which Cox mailed to subscribers when launching the new bill. We also discussed how Cox works with its customers in the event of cramming or other third-party billing questions.

We touched briefly on how Cox advertises Internet access speeds. We also noted that Cox discloses its network management practices in its terms of service and on its website. Cox also provides an annual privacy notice, as required by Section 631 of the Communications Act. That privacy notice is posted online. Cox also provides parental controls for all of its wireline and wireless services and also commits significant resources to its Take Charge! initiative, a public affairs campaign to help empower the parents in its communities to “take charge” of their children’s media safety.

Please do not hesitate to contact me if you have any questions.

Sincerely,

/s/

Grace Koh

Policy Counsel, Cox Enterprises, Inc.

cc: Arthur Scrutchins  
John B. Adams  
Lynn Ratnavale  
Bill Freedman  
Kurt Schroeder  
Rebecca Hirselj  
Katie Costello  
Matt Warner